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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

APR 27 1992

SUBJECT:

ON-SCENE COORDINATOR'S REPORT - Removal Action at American Pouch Site,
Chicago, IL (Site ID # LJ)

FROM:

Robert J. Bowden, Chief
Emergency and Enforcement Response Branch, HSE-5J *RJ Bowden*

TO:

Stephen D. Luftig, Director
Emergency Response Division, OS-210

THRU:

Norman R. Niedergang, Associate Division Director
Office of Superfund, HS-6J *N Niedergang*

Attached is the On-Scene Coordinator's (OSC) Report for the removal action conducted at the American Pouch site in Chicago, Illinois. The report follows the format outlined in the National Contingency Plan, Section 300.165. This removal began on November 19, 1990, and was completed on April 4, 1991. The OSC for this removal was Peter F. Guria.

The site posed an immediate threat to human health and the environment. The action was taken to mitigate threats posed by drums and laboratory-sized containers of hazardous substances and chemicals which were discovered in an abandoned three-story building. These materials posed threats through direct contact, inhalation, and ingestion.

Costs under the control of the OSC are estimated at \$152,115.84, of which \$107,642.34 was for the Emergency Response Cleanup Services contractor.

Any indication in this OSC Report of specific costs incurred at the site is only an approximation, subject to audit and final definitization by the U.S. EPA. The OSC Report is not a final reconciliation of the costs associated with a particular site.

Portions of the OSC Report appendices may contain confidential business or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

This site is not on the National Priorities List.

Attachment

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ON-SCENE COORDINATOR'S REPORT

CERCLA REMOVAL ACTION


AMERICAN POUCH SITE

CHICAGO, ILLINOIS

SITE ID # LJ

DELIVERY ORDER NO. 7460-05-164

Removal Dates: November 19, 1990 - April 4, 1991


Peter F. Guria
Response Section 1

4/14/92
Date

Emergency and Enforcement Response Branch
Office of Superfund
Waste Management Division
Region V
United States Environmental Protection Agency

EXECUTIVE SUMMARY

Site/Location: American Pouch, Chicago, Illinois
Removal Dates: November 19, 1990 - April 4, 1991

INCIDENT DESCRIPTION:

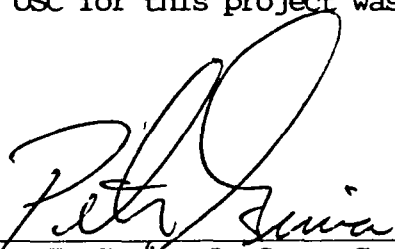
The American Pouch site is an abandoned three-story building which was used by the American Pouch Food Company, Inc., from January 1979 until sometime in 1983 to produce C-rations for the United States Army. On November 19, 1990, the United States Environmental Protection Agency (U.S. EPA) initiated a removal action at the American Pouch site. The removal action was taken to mitigate threats to the public health and environment posed by the presence of several drums and laboratory-sized containers of hazardous substances and chemicals which were discovered in the abandoned three-story building. These materials posed threats through direct contact, inhalation, and ingestion.

ACTIONS TAKEN:

The U.S. EPA began a removal on November 19, 1990. The following emergency removal activities were performed: inventory of drum and laboratory-sized chemical containers, sample collection, drum overpacking, lab-packing, and removal of hazardous materials from the American Pouch site.

Approximately 1,843 gallons of hazardous liquids, 1,833 pounds of hazardous solids, and a cylinder of flammable gas were transported off-site for incineration, disposal, or fuels blending. All actions taken were consistent with the National Contingency Plan.

The removal was completed on April 4, 1991, at an estimated cost under control of the On-Scene Coordinator (OSC) of \$152,115.84, of which \$107,642.34 was for the Emergency Response Cleanup Services contractor. The OSC for this project was Peter F. Guria.



Peter F. Guria, On-Scene Coordinator
Emergency and Enforcement Response Branch
United States Environmental Protection Agency
Region V

4/14/92
Date

TABLE OF CONTENTS

	<u>PAGE</u>
EXECUTIVE SUMMARY.....	i
LIST OF FIGURES.....	ii
LIST OF TABLES.....	ii
LIST OF ATTACHMENTS.....	ii
LIST OF APPENDICES.....	iii
 1.0 SUMMARY OF EVENTS.....	 1
1.1 Location/Initial Situation.....	1
1.2 Previous Actions/Site History.....	1
1.3 Threat to Public Health and the Environment.....	1
1.3.1 Natural Resource Damage.....	3
1.4 Attempts to Obtain a Response by Potentially Responsible Parties.....	3
1.5 Chronological Narrative of Response Actions Taken.....	4
1.5.1 Staging, Inventory, Sampling, and Storage.....	4
1.5.2 Lab-Packing.....	5
1.5.3 Roll-off Removal.....	5
1.5.4 Drum Sampling.....	8
1.5.5 Drum Removal.....	8
1.6 Community Relations.....	8
1.7 Cost Summary.....	8
 2.0 EFFECTIVENESS OF REMOVAL ACTIONS.....	 10
2.1 The Potentially Responsible Parties.....	10
2.2 State and Local Agencies.....	10
2.3 Federal Agencies and Special Teams.....	10
2.4 Contractors, Private Groups, and Volunteers.....	10
 3.0 DIFFICULTIES ENCOUNTERED.....	 10
 4.0 RECOMMENDATIONS.....	 11

LIST OF FIGURES

<u>FIGURE</u>	<u>PAGE</u>
1 - SITE LOCATION MAP	2
2 - SITE FEATURES MAP	6

LIST OF TABLES

<u>TABLE</u>	<u>PAGE</u>
1 - WASTE DISPOSAL SUMMARY	7
2 - SUMMARY OF TOTAL ESTIMATED REMOVAL COSTS	9

LIST OF ATTACHMENTS

ATTACHMENT A - TIMELINE OF EVENTS

Emergency and Enforcement Response Branch
Office of Superfund, U.S. EPA, Region V

OSC REPORT APPENDICES LIST*
AMERICAN POUCH
SITE ID # LJ
DELIVERY ORDER NO. 7460-05-164

1. OPERATIONAL FILES

- 1-A - Action Memos/Additional Funding
Requests/Time Exemptions
- 1-B - POLREPS
- 1-C - Site Entry/Exit Log
- 1-D - Hot Zone Entry/Exit Log
- 1-E - Site Safety Plan
- 1-F - Site Log(s)
- 1-G - Daily Work Orders
- 1-H - General Correspondence/Information
- 1-I - Site Photos
- 1-J - Security Guard Reports
- 1-K - Background Information/Enforcement
- 1-L - Administrative Record

2. FINANCIAL FILES

- 2-A - Delivery Orders/Procurement Requests
Modifications to contract (ERCS)
- 2-B - Technical Directive Documents/Modifications (TAT)
- 2-C - Daily Cost Reporting U.S. EPA Form 1900-55's
- 2-D - Daily Cost Summaries/ERCS Invoices
- 2-E - Equipment and Material Tracking
- 2-F - Incident Obligation Log/U.S. EPA Costs
- 2-G - TAT Cost Sheets
- 2-H - Await Bill Tracking

3. TECHNICAL FILES

- 3-A - TAT Site Assessment and Analytical Results
- 3-B - Analytical Results/QA/QC
- 3-C - Manifests
- 3-D - Disposal Information
- 3-E - Drum Logs

- * Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

1.0 SUMMARY OF EVENTS

1.1 Location/Initial Situation

The American Pouch site is located at 4603 West Gladys Avenue on the west side of Chicago, Illinois (Figure 1). The abandoned three-story building covers approximately 1 acre and contained drums and laboratory-size containers of various chemicals. The site is bordered by Gladys Avenue and a public park to the north, a parking lot to the west, a building and residence to the south, and Chicago and Northwestern railroad tracks to the east. The area surrounding the site is primarily residential, with a park located across from the site on the north side of Gladys Avenue.

1.2 Previous Actions/Site History

The American Pouch site is an abandoned three-story building which was used by the American Pouch Food Company, Inc., from January 1979 until sometime in 1983 to produce C-rations for the United States Army. Following a fire at the building on October 28, 1990, the Chicago Fire Department's Hazard Investigation Team (HIT) investigated and discovered drums and laboratory-sized containers of chemicals scattered throughout the building. The City of Chicago Energy and Environment Division requested the United States Environmental Protection Agency's (U.S. EPA) assistance to assess threats to human health and the environment posed by the abandoned materials.

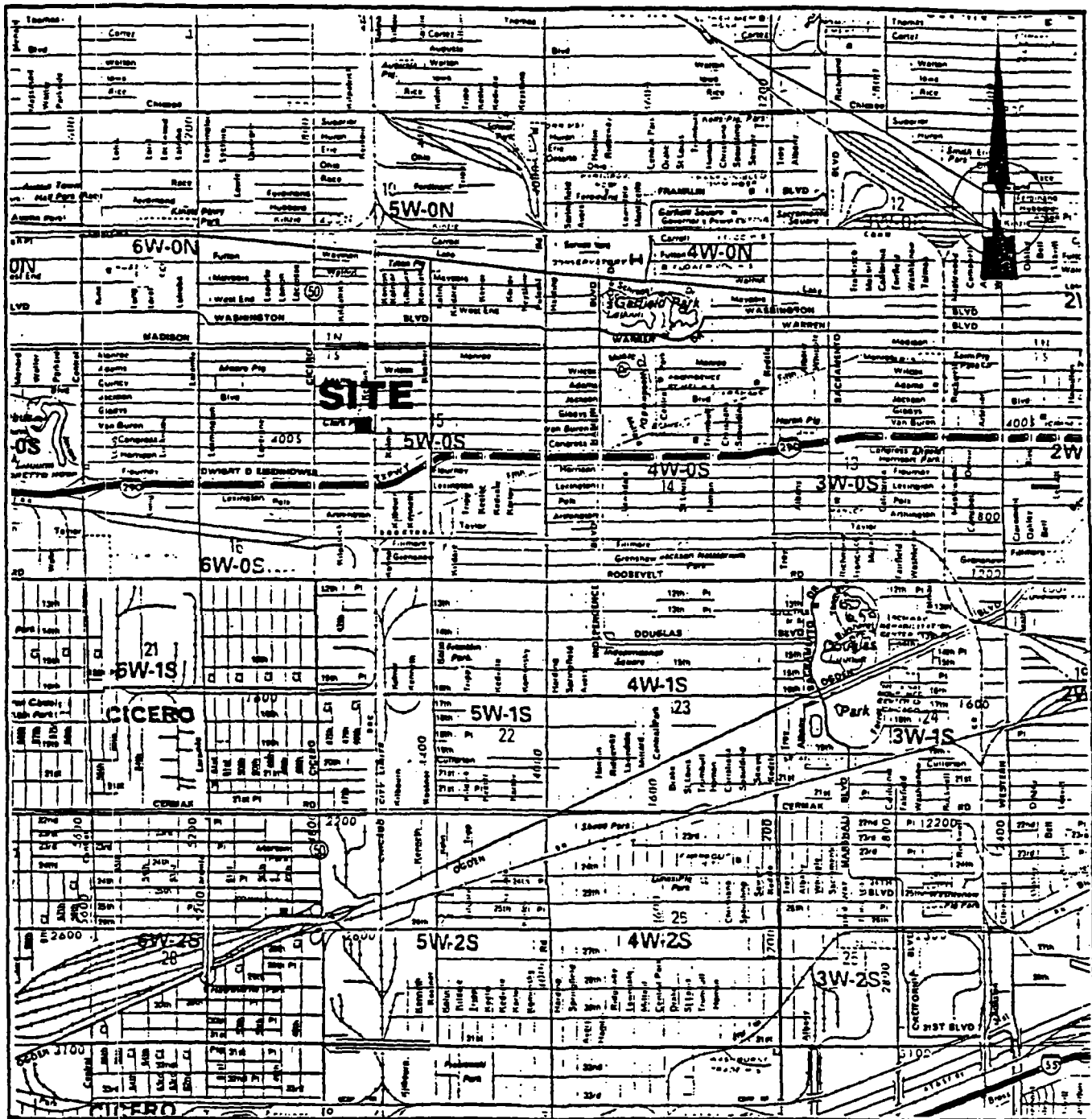
On November 15, 1990, the Technical Assistance Team (TAT) conducted a site assessment at the American Pouch site and discovered numerous laboratory-sized containers, drums, and compressed gas cylinders. Labels on the containers included hydrochloric acid, sulfuric acid, ammonium hydroxide, sodium thiosulfate, and iodine-bromine solution. Labels on some of the drums included "xylol" (flammable solvent) and "ZEP formula 777-EC" (weed killer). Some of the drums were open and some were unlabelled. Two drum samples collected by the TAT revealed the presence of xylenes, ethylbenzene, and other Hazardous Substance List (HSL) parameters. Details of the TAT site assessment can be found in Appendix 3-A.

1.3 Threat to Public Health and the Environment

Based on the site assessment and analytical data obtained, conditions at the American Pouch site posed a direct threat to human health and the environment and warranted a removal action as outlined in paragraph (b)(2) of Part 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The following conditions existed at the American Pouch site:

- a) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain:

Site access was unrestricted and the potential for exposure to contaminants via direct contact was high. Laboratory chemicals found on site included various acids and bases that cause severe burns when in



QUADRANGLE LOCATION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

TITLE
SITE LOCATION MAP

FIGURE # 1

SITE AMERICAN POUCH

SCALE 1 IN. = 1/2 MI.

CITY CHICAGO STATE ILLINOIS

P.A.N. EIL0722SAA

SOURCE RAND MCNALLY MAPFINDER
CHICAGO AND COOK COUNTY

DATE 1/16/91
REVISED

contact with the skin. Toxic vapors given off by these materials can cause respiratory failure. The site is located in a residential neighborhood and has a public park and residence within 30 feet. Clothing and other personal belongings were found, indicating vagrants were living within the building. Several dogs were observed living in the building and were potentially tracking spilled materials off site.

- b) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release:

Drums were observed on site in various stages of deterioration. Air monitoring conducted from these drums revealed HNu levels from 25 to 100 units, indicating the presence of volatile compounds. Some drums were observed on their sides releasing their contents.

- c) Threat of fire or explosion:

Several laboratory chemicals were found on site that are incompatible when mixed together. Several oxidizing agents were found which can cause violent reactions when mixed with acid. Sodium hydroxide is a very strong base and, when in the presence of water, can produce enough heat to ignite other combustible material. A cylinder of highly flammable acetylene was found dating back to 1950. The construction of the older cylinders made them susceptible to explosion if they were handled incorrectly. A number of containers of ammonium chloride were also found on site. Ammonium chloride can become explosive when exposed to heat and can give off toxic ammonia vapors once ignited and allowed to burn.

- d) The availability of other appropriate Federal or State response mechanism to respond to the release:

The Illinois Environmental Protection Agency (IEPA) did not have current funding available to respond to the time-critical removal.

1.3.1 Natural Resource Damage

The American Pouch site is located in a commercial/urban area of Chicago and is bordered by a public park and private residences. The nearest body of water is the Chicago River, approximately 5 miles to the east. Since a major release did not occur, the Chicago River was not immediately affected. No other natural resource areas were identified as being impacted by the site, and no formal study of natural resource damage was conducted by the U.S. Department of the Interior or the IEPA.

1.4 Attempts to Obtain a Response by Potential Responsible Parties

Ownership of the American Pouch site was unclear at the time removal activities began at the site. When the removal began, it was believed that the American Pouch Food Company, Inc., had owned and operated the site for a number of years prior to February 9, 1981, on which date an

assignment regarding the property was made to the United States Department of Commerce, Economic Development Administration. This arrangement was apparently carried out through the Continental Illinois National Bank and Trust Company of Chicago. Apparently a reassignment to Bankers Leasing Company was made, after which a real estate tax sale may have occurred. According to a local resident, a landscaping company of unknown name also operated on the property. On-Scene Coordinator (OSC) Peter Guria provided Bankers Leasing Company with verbal notification of their potential liability and requested they take immediate action to cleanup the site, but the company claimed to have no current interests in the property.

According to a title search conducted in December 1990, the American Pouch Food property is currently owned by American Pouch Food Company, Inc., 695 Executive Drive, Woodbrook, Illinois, which acquired the property from 4603 West Gladys Building Corporation, Inc., on December 19, 1978. In a letter dated March 9, 1991, the U.S. EPA notified American Pouch Food Company, Inc., that they are considered a potentially responsible party (PRP) and requested a response concerning their willingness to perform or finance a cleanup of the site. American Pouch Food Company, Inc., did not respond to the letter.

1.5 Actions Taken

On November 19, 1990, a removal action was initiated under a \$50,000 verbal authority to stabilize and secure threats posed at the site. An Action Memorandum for \$150,268 was signed by the Waste Management Division Director on January 4, 1991. The removal was conducted by the ERCS contractor, PEI Associates, who subcontracted the actual site work to OH Materials Corporation (OHM) of Findlay, Ohio.

The removal action consisted of two phases. Phase one occurred on November 20-21 and 26-29, 1990, and consisted of staging and inventorying laboratory chemical containers; staging, sampling, overpacking, and securing drums on the first floor of the building; and crushing empty drums and gas cylinders then loading them into a roll-off box.

Phase two occurred between December 7, 1990, and April 4, 1991, and consisted of identifying, lab-packing, and removing the laboratory-sized containers; removing the roll-off box from the site; collecting additional composite drum samples for shipment to disposal facilities; procuring a facility to accept the wastes; and removing the drums from the building.

1.5.1 Staging, Inventorying, Sampling, and Storage

On November 19, 1990, the OSC, TAT, and an OH Materials Corporation (OHM) crew mobilized to stage and inventory chemicals found in the building. A thorough search of the building was conducted, with materials staged on the first floor near the entrance at the northeast

corner of the building (Figure 2). During the search of the building, three diesel fuel tanks were discovered in the southeast corner of the building. Two of the tanks were aboveground tanks; one was empty and the other contained approximately 320 gallons of fuel. The third tank was underneath a false floor and contained approximately 2 feet of fuel. The size of the third tank is unknown.

On November 26, 1990, OHM collected 20 samples from drums and containers which were discovered inside the building. After sample collection, the drums were overpacked and placed inside a storage room within the building. The doorway to the storage room was then secured. In addition, a soil sample was collected from an alley on the south side of the building where a transformer appeared to have leaked. The 20 drum samples were analyzed for compatibility, while the soil sample was analyzed for PCBs. All analyses were conducted by Gulf Coast Laboratories, University Park, Illinois. While the drums were staged and sampled, an OHM chemist conducted an inventory of the laboratory-sized containers. The laboratory-sized containers were then placed on shelves in the staging area, which were covered with visqueen after the inventory was completed.

On November 29, 1990, a roll-off box was mobilized to the site. Empty containers, gas cylinders, and drums were crushed and loaded into the roll-off. Personal protective clothing was also placed in the roll-off. Security, which had been on site during non-working hours since November 19, 1990, was increased to 24 hours per day at the completion of Phase one.

1.5.2 Lab-Packing

On December 7, 1990, Chemical Waste Management (CWM) commenced lab-packing operations. After testing to determine the chemical characteristics of 109 chemicals, a total of 30 lab-packs were generated. On December 11, 1990, the 30 lab-packs were removed from the site. Seven of the lab-packs, which included flammable liquids, oxidizers, and corrosives, were shipped to CWM Chemical Services, Chicago, Illinois, for incineration. Twenty-three of the lab-packs, which included flammable liquids, flammable solids, corrosives, and non-regulated special waste, were shipped to CWM's Trade Waste Incinerator in Sauget, Illinois, for incineration. A waste disposal summary is presented in Table 1.

1.5.3 Roll-off Removal

On December 18, 1990, the roll-off box was removed from the site. The contents were classified as non-regulated waste material and transported by Metropolitan Environmental to Chemical Waste Management's CID Processing facility in Chicago, Illinois, for landfilling. Security was dismissed at this time.

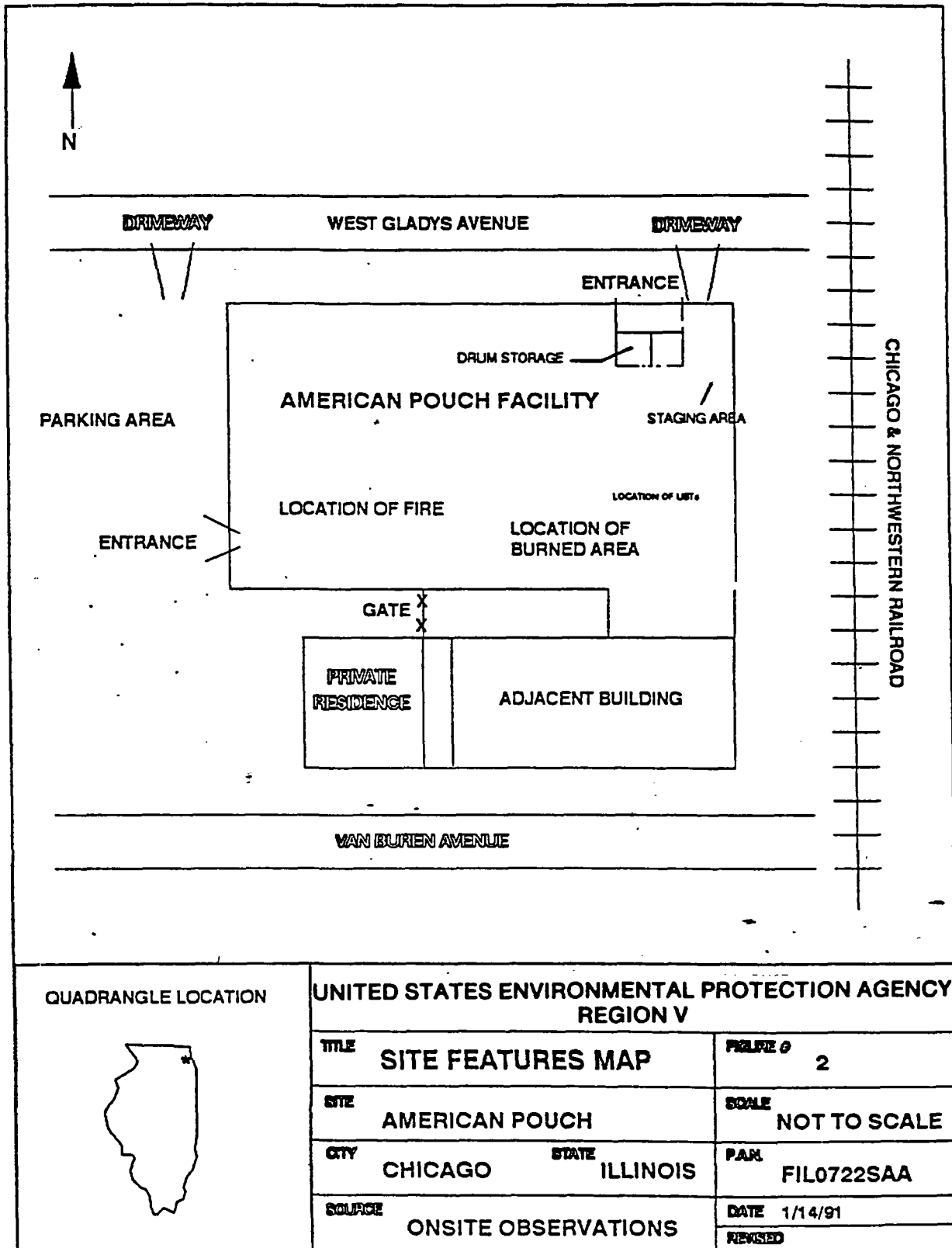


TABLE 1
WASTE DISPOSAL SUMMARY
AMERICAN POUCH

<u>Waste Category</u>	<u>Quantity</u>	<u>Date Shipped</u>	<u>Manifest No.</u>	<u>Disposal Method</u>	<u>Facility/Location</u>
Flammable liquids Corrosives Oxidizers	143 gallons	12/11/90	39290	Incineration	CWM Chemical Services/ Chicago, IL
Flammable liquids Flammable solids Corrosives Non-regulated- special waste	485 gallons	12/11/90	39090	Incineration	Trade Waste Incineration/ Sauget, IL
Non-regulated waste	20 cu. yards	12/18/90	28278	Landfill	CID Processing/ Chicago, IL
Flammable liquids Flammable solids Corrosives Non-regulated waste	1215 gallons 1833 pounds	04/04/91	10405	Fuels blending	Pollution Control Industries of Indiana/ East Chicago, IN
Flammable gas	1 cylinder	04/04/91			Union Carbide Linde Division/ East Chicago, IN

1.5.4 Drum Sampling

On February 13, 1991, the OSC and TAT mobilized to the site to collect composite samples from nine of the drums because additional sample volumes were required for approval of disposal facilities. Due to frozen liquids in some of the drums, only three of the five composite samples could be collected. The samples were secured in coolers which were placed in the drum storage room until shipment could be arranged.

1.5.5 Drum Removal

On April 2, 1991, the U.S. EPA was notified by the Chicago Police Department (CPD) that a sample bottle with a U.S. EPA tag was discovered inside the building. Subsequent investigation revealed that the drum storage room had been vandalized and the coolers stolen. The sample bottle was found lying in a pile of vermiculite located near the doorway of the drum storage room. The coolers and other samples had been removed and could not be located. In addition, one of the drums had been moved to the south side of the building, but was still intact. At this time, a police incident report was filed and local health officials were notified of the situation. On April 3, 1991, U.S. EPA learned that United States Pollution Control Industries of America, Inc. (USPCIA), East Chicago, Indiana, would accept the drummed waste for fuels blending. While the disposal costs were higher than anticipated, it was necessary to expedite disposal due to additional vandalism. Also, funds would be saved by not having to increase security. An acetylene gas cylinder was relinquished to Union Carbide-Linde Division, East Chicago, Indiana, on April 3, 1991.

On April 4, 1991, the OSC, TAT, and two OHM technicians mobilized to the site to prepare for the removal of the drums. A total of 21 drums were transported by Indiana Environmental Transport Corporation to USPCIA for fuels blending.

1.6 Community Relations

U.S. EPA policy requires a community relations plan for any removal action where on-site activities would be in excess of 4 months. Since it was anticipated that on-site activities would be completed in one month, no formal community relations plan was developed.

Throughout the removal, the OSC maintained open communication with the City of Chicago officials and members of the community. However, the site received little attention from the press and local community.

1.7 Cost Summary

PEI Associates, Inc., was the prime ERCS contractor for the American Pouch site, subcontracting the actual on-site work to OHM of Findlay, Ohio. Site activities began on November 19, 1990, and were completed on April 4, 1991. Table 2 provides an itemized listing of ERCS contractor expenditures by the major categories of labor, equipment, materials,

TABLE 2
SUMMARY OF TOTAL ESTIMATED REMOVAL COSTS
AMERICAN POUCH
NOVEMBER 19, 1990 - APRIL 4, 1991

EXTRAMURAL COSTS:

ERCS Contractor (1)	\$ <u>107,642.34</u>
Labor/Travel/Subsistence	\$ 19,340.15
Equipment	\$ 2,823.79
Materials	\$ 2,182.58
Subcontractors	
Sampling/Analysis	\$ 17,337.58
Transportation	\$ 525.73
Disposal	\$ 29,434.02
Other	\$ 35,998.49
TAT Contractor (2)	\$ 30,280.50
Subtotal	\$ <u>137,922.84</u>

INTRAMURAL COSTS: (3)

U.S. EPA, OSC - Direct Costs	\$ 5,130.00
Indirect Costs	\$ 9,063.00
Subtotal	\$ <u>14,193.00</u>
ESTIMATED TOTAL PROJECT COSTS	\$ <u><u>152,115.84</u></u>
PROJECT CEILING	\$ 150,268.00

- (1) Source: ERCS Contractor PEI Associates, Inc.,
U.S. EPA Form 1900-55s through 6/15/91 (Appendix 2-C).
- (2) Source: TDDs T05-9011-013A, T05-9011-017C, T05-9011-806A.
General TDD listing for week ended 7/20/91.
- (3) Source: Incident Obligation Log (Appendix 2-F).

Any indication of specific costs incurred at the site is only an approximation, subject to audit and final definitization by the U.S. EPA. The OSC Report is not meant to be a final reconciliation of the costs associated with a particular site.

transportation, disposal, subcontractors, and laboratory analysis, as well as costs incurred by the U.S. EPA and TAT.

These costs are estimated, subject to final audit and final definitization by the U.S. EPA. The OSC Report is not intended to be a final reconciliation of all costs associated with a particular site.

2.0 EFFECTIVENESS OF REMOVAL ACTIONS

2.1 Responsible Parties

No action was undertaken by PRPs at the American Pouch site. For information regarding attempts to obtain PRP action, see Section 1.4.

2.2 State and Local Agencies

The Chicago Fire Department's Hazard Investigation Team conducted the initial inventory of chemicals discovered in the building. This inventory was forwarded to the Chicago Department of Consumer Services. The Chicago Energy and Environment Division contacted the U.S. EPA and informed them of the situation at the site. During the removal, the Chicago Police Department made extra drive-bys of the site to provide additional security.

2.3 Federal Agencies and Special Teams

The U.S. EPA was the only Federal Agency involved in removal actions at the American Pouch site, and provided all monetary resources for removal activities conducted. Under direct guidance of the OSC, the cleanup effectively removed existing environmental and public health threats posed by conditions at the site.

2.4 Contractors, Private Groups, and Volunteers

On-site activities conducted by the ERCS subcontractor, OHM, proceeded in a timely, efficient manner. Site stabilization and inventory was completed quickly, preventing any further release of hazardous substances from drums and lab containers. Lab chemicals were identified and packed quickly, allowing for immediate removal from the site. Disposal coordination by the prime ERCS contractor was conducted very slowly which resulted in vandalism and theft of the sample storage containers. This lead to an extended time delay between the site stabilization and waste disposal phases.

3.0 DIFFICULTIES ENCOUNTERED

On April 2, 1991, the U.S. EPA was notified by the Chicago Police that a sample bottle with a U.S. EPA tag had been discovered inside the building. Subsequent investigation revealed that the drum storage room had been vandalized and the samples, which had been collected earlier for waste profile analysis and were awaiting shipment, had been removed. On April 3, 1991, it was discovered that Pollution Control Systems of

Indiana, Inc., would accept the waste immediately for fuels blending. The drums were removed from the site on April 4, 1991.

The vandalism which occurred was a direct result of a long delay in disposal coordination by PEI Associates, Inc., which precluded timely disposal of the drums remaining at the American Pouch site. The drums had to be resampled in February 1991 after it was learned that additional sample volumes were required for shipment to disposal facilities. The samples were awaiting shipment when the vandalism occurred at the beginning of April. Had disposal coordination been conducted in a more efficient manner, the drums could have been disposed of quickly and the vandalism would have been avoided.

4.0 OSC RECOMMENDATIONS

Timely disposal of hazardous substances and materials is critical when conducting emergency removal activities. It has been repeatedly emphasized to the prime ERCS contractor, PEI Associates, that disposal coordination begins as soon as waste stream information is obtained. Failure to conduct disposal in a timely efficient manner results in increased cost to the U.S. Government. The ERCS contractors operate under an award fee contract to provide cleanup services to the U.S. EPA. It is their responsibility to provide these services in a timely, cost-efficient manner. Provisions should be added to the ERCS contract to penalize the contractor when this is not accomplished.

ATTACHMENT A

TIMELINE OF EVENTS AMERICAN POUCH SITE, CHICAGO, ILLINOIS

ACTIVITY	1990					1991		
	NOV.		DEC.			FEB.		
	18	25	3	10	18	4	11	18
Staging, Inventory, Sampling, Storage	—	—						
Security								
Lab Packing								
Roll-off Removal								
Drum Sampling								
Drum Removal								
Disposal Coordination (PEI)								